

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

NEW HAMPSHIRE YOUTH MOVEMENT,

Plaintiff,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State,

Defendant.

Case No. 1:24-cv-00291-SE-TSM

JOINT MOTION TO EXTEND TIME TO FILE JOINT DISCOVERY PLAN

NOW COME all parties, by and through their respective counsel, and jointly move the Court to extend time to file a joint proposed discovery plan as required by Rule 26(f) of the Federal Rules of Civil Procedure, and state as follows:

1. On March 11, 2025, Plaintiff noticed its intent to amend its Complaint. ECF No. 47.
2. On March 13, 2025, the Court ordered Plaintiff to file an amended complaint on or before March 18, 2025. ECF No. 48 at 2. The Court also ordered the parties to file a joint revised discovery plan on or before March 18, 2025. *Id.*
3. As currently directed by the Court, the amended complaint and the discovery plan will be simultaneously due. It will be challenging for the parties to meaningfully confer over a discovery plan without having the operative complaint from which to have a discussion.
4. So, the parties request that the Court extend the deadline to file a discovery plan one day, to March 19, 2025.
5. Local Rule 7.1(a)(2): A memorandum of law is not required because this Motion incorporates citations of supporting points and authorities, as required.

6. Local Rule 7.2(a): The requested extension will not result in the continuance of any hearing, conference, or trial.

Prayer for Relief

WHEREFORE, the parties respectfully request that this Honorable Court:

- A. Order the parties to file a joint discovery plan on or before March 19, 2025; and
- B. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANT DAVID M. SCANLAN, in his
official capacity as N.H. Secretary of State

By his attorney,

JOHN M. FORMELLA
NEW HAMPSHIRE ATTORNEY GENERAL

Date: March 16, 2025

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PLAINTIFF NEW HAMPSHIRE YOUTH
MOVEMENT

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis
Michael P. DeGrandis